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17 *Attorneys for Plaintiffs*

18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 ABEL CANTARO CASTILLO on behalf of himself  
and those similarly situated,

21 Plaintiff,

22 vs.

23 WESTERN RANGE ASSOCIATION  
24 Defendant.

CASE NO. 3:16-cv-00237-RCJ-CLB

25 **PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

26 Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Cántaro Castillo hereby  
27 moves this Court for partial summary judgment on the issue of Defendant Western Range  
28 Association's status as a joint employer of Plaintiff and the putative class. Plaintiff's claims in this

1 case depend in part on Defendant Western Range Association being the joint employer of Plaintiff  
2 and other H-2A shepherders, a status Defendant has disputed. As noted in Plaintiff's Memorandum  
3 of Points and Authorities, Plaintiff assumes given the sequence of briefing that the Court will rule on  
4 the fully-briefed motion for class certification prior to ruling on summary judgment, in order to  
5 avoid the prospect of one-way intervention.

6 In support of the relief requested herein, Plaintiff relies on his accompanying  
7 contemporaneously filed Memorandum of Points and Authorities, the exhibits thereto, and the record  
8 herein. Pursuant to the governing Protective Order, Dkt. 184 at ¶ 14, Plaintiff has filed his  
9 memorandum in support and certain exhibits under seal, pending review by this Court.

10 Dated: April 18, 2022

11 Respectfully Submitted,

12 COHEN MILSTEIN SELLERS & TOLL PLLC

13 /s/Christine E. Webber  
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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, a true and correct copy of the foregoing was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Christine E. Webber  
Christine E. Webber